



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WYC:RMT
F.#2006R00642

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 1, 2010

By U.S. Mail and ECF

Michael Louis Leavitt, Esq.
Cohen & Leavitt P.C.
277 Broadway, Suite 400
New York, NY 10007

Re: United States v. Raghunath et al.
Criminal Docket No. 10-70 (JBW)

Dear Counsel:

The government writes pursuant to Rule 16 of the Federal Rules of Criminal Procedure and with respect to the above-referenced matter. Following your execution yesterday of a protective order in this case, the government can now make the balance of discovery available. This discovery includes the government's May 28, 2010 production (bearing Bates numbers 00001 to 08645) and the government's June 21, 2010 production (bearing Bates numbers B000000001 to B000017793). You may obtain copies of these documents by contacting Joe Meisner at First Choice Copy, telephone number (718) 381-1480, and asking for print job numbers 26046 and 26139.

In addition, enclosed is a compact disk containing bank records and other discovery relevant to the above-referenced matter, bearing Bates numbers C000000001 to C000003343. Also stored on that CD, bearing Bates numbers IR000000001 to IR000000003, is a copy of a redacted Federal Bureau of Investigation report reflecting statements made by the defendant Ishwardat Raghunath or information provided by him subsequent to his arrest. Copies of this CD were produced to defendants Halal Ahmed and Phyllis Seemongal on June 28, 2010.

Finally, and as the government has previously indicated, the government has in its possession numerous computers and portable electronic data storage devices seized during the course of this investigation. You may call me to

arrange a mutually convenient time to inspect, copy, and/or photograph the evidence and original documents discoverable under Rule 16.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Richard M. Tucker
Assistant United States Attorney
(718) 254-6204

Enclosure

cc: Clerk of the Court (JBW) (w/o enclosure)